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Of Attorneys for Respondent Spirit Bridger

**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

Portland Division

In re the Application of:

Case No.: 3:23-cv-00850-IM

ANDREW CHARLES NISBET,

Petitioner,

and

RESPONDENT'S STATEMENT OF  
FEES AND COSTS

SPIRIT ROSE BRIDGER,

Respondent.

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The Convention on the Civil Aspects of International Child Abduction  
Done at the Hague on 25 Oct 1980  
International Child Abduction Remedies Act, 22 USC § 9001 *et seq.*

COMES NOW, Respondent Spirit Bridger, by and through her attorney of record, Katrina Seipel, and submits her Statement of Fees and Costs, requesting that Petitioner and/or Petitioner's counsel be joint and severally liable for her reasonable attorney fees and costs incurred in this matter. Pursuant to this Court's inherent power to award attorney fees, FRCP 37, FRCP 54(d), and 28 U.S.C. § 1927, Respondent is entitled to a reasonable sum for attorney fees, costs, and expenses reasonably and necessarily incurred.

The number of hours and services rendered in this matter by each attorney and staff member, and the hourly rate for each, are set forth in detail in the attached **Exhibit 1**.

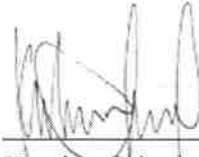
Exhibit 1 is summarized as follows:

<u>NAME</u>	<u>HOURLY RATE</u>	<u>HOURS</u>	<u>FEES</u>
Attorney Jaye Taylor	\$475	0.8	\$380.00
Attorney Katelyn Skinner	\$410	12.4	\$5,084.00
Attorney Katrina Seipel	\$340	159.8	\$54,332.00
Attorney Sarah Holmes	\$280	0.5	\$140.00
Paralegal Wendy Goodyear	\$240	32.2	\$7,728.00
Legal Assistant Lucas Dudley	\$140	6.5	\$910.00
Legal Assistant Megan Johnson	\$130	0.5	\$65.00
Project Assistant Monica Via	\$125	2.3	\$287.50
<b>Total Fees</b>			<b>\$68,926.50</b>

The following costs are reasonable and necessary and are not included in the hourly rates set forth above:

<u>DESCRIPTION</u>	<u>TOTAL</u>
Expert Witness Retainer: Dr. Poppleton	\$3,750.00
Research Costs	\$683.91
Expert Witness Fee: Merle Weiner	\$400.00
Mileage/Parking	\$152.08
Expert Witness Fee: Advocate Steenson	\$5,195.15
Expert Witness Additional Fees: Dr. Poppleton	\$7,968.75
<b>Total Costs</b>	<b>\$18,149.89</b>

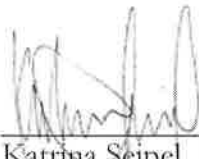
Based on the above, Respondent is entitled to an award for her reasonable and necessary fees and costs totaling **\$87,076.39**. Respondent's Statement of Fees and Costs is supported by **Exhibit 1** and the Memorandum filed herewith and incorporated by reference. Respectfully submitted this 7th day of November, 2023.



Katrina Seipel, OSB #164793  
Of Attorneys for Respondent

CERTIFICATE OF SERVICE

I certify that this document was served by electronic service through the CM/ECF filing system and by e-mail upon Bradley Lechman-Su, at [bradley@bradleylechmansu.com](mailto:bradley@bradleylechmansu.com), on this 7th day of November, 2023.



Katrina Seipel, OSB #164793  
Of Attorneys for Respondent  
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## SPIRIT BRIDGER, USDC Case 3:23-cv-00850-IM

Prof	Date	Units	Price	Amount	Component	Narrative
WAG	06/28/2023	0.40	\$0.00	\$0.00	Professional Fee	Confer with Attorneys Taylor and Seipel re: possible Hague convention case (no charge)
LWD	07/05/2023	0.00	\$0.00	\$0.00	Professional Fee	Intake - initial call with client; fill out new client intake sheet; create contact cards for conflict check database; reserve conference room for consultation & calendar consultation; open matter file; complete new matter pending checklist; open ShareFile folder; send client consultation confirmation email with information for making online payment and uploading documents to ShareFile (no charge)
LWD	07/10/2023	0.30	\$0.00	\$0.00	Professional Fee	Intake - prepare materials for in-person consultation (no charge)
KAS	07/10/2023	2.00	\$340.00	\$680.00	Professional Fee	Review Hague law in preparation for consult; initial consultation with client
LWD	07/11/2023	0.20	\$0.00	\$0.00	Professional Fee	Send Fee Agreement to client via DocuSign and Email to client (no charge)
KAS	07/11/2023	1.10	\$340.00	\$374.00	Professional Fee	Research UK territories; review consult notes and send recap to client via email at client's request
LWD	07/13/2023	0.20	\$0.00	\$0.00	Professional Fee	Intake - send information on how to make international payments to client (no charge)
KAS	07/13/2023	0.90	\$340.00	\$306.00	Professional Fee	Exchange emails with client regarding case and evidence
LWD	07/18/2023	0.50	\$0.00	\$0.00	Professional Fee	Emails to client re: facilitating international payments; follow-up emails to accounting department regarding status of client's payments (no charge)
LWD	07/24/2023	0.40	\$0.00	\$0.00	Professional Fee	Intake - save signed fee agreement to ProLaw; follow up with accounting and client via status of client's retainer payment; work with client & accounting regarding payment (no charge)
WAG	07/31/2023	0.20	\$0.00	\$0.00	Professional Fee	Review PACER; Download current docket report; Email to Attorney Seipel re: same (no charge)
KAS	07/31/2023	0.20	\$0.00	\$0.00	Professional Fee	Confer with Legal Assistant Dudley regarding service (no charge)
LWD	08/01/2023	0.30	\$0.00	\$0.00	Professional Fee	Intake - communicate with client and accounting regarding payment status (no charge)
WAG	08/03/2023	0.10	\$0.00	\$0.00	Professional Fee	Email to client re: retainer options (no charge)
WAG	08/10/2023	0.20	\$0.00	\$0.00	Professional Fee	Meet briefly with client re: retainer and next steps (no charge)
LWD	08/10/2023	0.30	\$140.00	\$42.00	Professional Fee	Scan and save documents brought into office by client
KAS	08/10/2023	0.30	\$340.00	\$102.00	Professional Fee	Exchange emails with client regarding service
KAS	08/13/2023	0.30	\$340.00	\$102.00	Professional Fee	Exchange emails with client regarding hiring Dr. Poppleton
KAS	08/14/2023	0.20	\$340.00	\$68.00	Professional Fee	Exchange emails with Dr. Poppleton regarding case consult
KAS	08/15/2023	0.30	\$340.00	\$102.00	Professional Fee	Exchange emails with client regarding Dr. Poppleton's assistance; exchange emails with Dr. Poppleton regarding the same
WAG	08/16/2023	0.20	\$240.00	\$48.00	Professional Fee	Finalize and email signed engagement agreement to expert witness; Pay expert retainer on-line
KAS	08/16/2023	0.20	\$340.00	\$68.00	Professional Fee	Exchange emails with Dr. Poppleton regarding consult; exchange emails with client regarding the same



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Prof	Date	Units	Price	Amount	Component	Narrative
KDS	08/17/2023	2.50	\$410.00	\$1,025.00	Professional Fee	Review client documents in preparation for call with Dr. Poppleton; call with Dr. Poppleton (no charge for this call); research status of opposing party's incarceration as relevant to grave risk of harm to children, review news articles; research and reach out to Jersey attorneys who may assist in advising on status of opposing party's release as relevant to grave risk to children
LWD	08/17/2023	0.20	\$140.00	\$28.00	Professional Fee	Set up ShareFile folder and send documents to Dr. Poppleton via ShareFile
KAS	08/17/2023	3.70	\$340.00	\$1,258.00	Professional Fee	Review opposing party's psychiatric records; initial consult with Dr. Poppleton; begin case law research surrounding defenses; confer with Attorney Skinner regarding case issues and potential experts; connect client to Dr. Poppleton to schedule evaluation; send email to Professor Weiner regarding consult
WAG	08/18/2023	0.40	\$240.00	\$96.00	Professional Fee	Emails to/from various potential expert witnesses re: conflict information and possible appointment times
WAG	08/21/2023	0.20	\$240.00	\$48.00	Professional Fee	Emails to/from potential expert witness' office
KDS	08/21/2023	1.00	\$410.00	\$410.00	Professional Fee	Call with potential expert in Jersey; confer with Attorney Seipel regarding strategy and next steps
KAS	08/21/2023	3.80	\$340.00	\$1,292.00	Professional Fee	Prepare for and meet with Attorney Paul Nicholls; confer with Attorney Skinner regarding case; review Jersey judgments; exchange emails with Paul Nicholls regarding the same; case analysis
KDS	08/22/2023	2.50	\$410.00	\$1,025.00	Professional Fee	Research and review of case documents on custody rights, exercise of custody rights, habitual residence, incarcerated petitioner, grave risk, intolerable situation, applicable country to custody rights, client's immigration situation in
WAG	08/22/2023	0.20	\$240.00	\$48.00	Professional Fee	Revise Notice of Appearance; Forward same to Attorney Seipel for final review
LWD	08/22/2023	0.10	\$140.00	\$14.00	Professional Fee	Download and save documents from ShareFile
KAS	08/22/2023	5.40	\$340.00	\$1,836.00	Professional Fee	Exchange emails with client and Dr. Poppleton's office to coordinate meeting; confer with Attorney Skinner regarding case; exchange emails with Paul Nicholls regarding scope of work and fees; revise Notice of Representation; exchange emails with Kristen LaMont to obtain her client file; case analysis; exchange emails with client regarding the same; work on Answer
WAG	08/23/2023	0.40	\$240.00	\$96.00	Professional Fee	Download and save relevant documents from client to electronic case file
WAG	08/23/2023	0.20	\$240.00	\$48.00	Professional Fee	Finalize, scan, e-file, and e-serve Notice of Appearance of Counsel for Respondent; Email same to opposing counsel; Email re: same to client
KDS	08/23/2023	1.00	\$410.00	\$410.00	Professional Fee	Research on mootness argument due to Petitioner's move from country; review Attorney Lamont's file and correspondence between attorneys
WAG	08/23/2023	0.40	\$240.00	\$96.00	Professional Fee	Begin converting exhibits to Response to PDFs in preparation for inclusion for e-filing
KAS	08/23/2023	7.70	\$340.00	\$2,618.00	Professional Fee	Case analysis; confer with Attorney Skinner regarding case; exchange emails with client regarding the same; review client documents; finalize Notice of Appearance; work on Answer; send additional documentation to Dr. Poppleton



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## SPIRIT BRIDGER, USDC Case 3:23-cv-00850-IM

Prof	Date	Units	Price	Amount	Component	Narrative
KDS	08/24/2023	0.90	\$410.00	\$369.00	Professional Fee	Review and revise Answer and Affirmative Defenses
WAG	08/24/2023	0.40	\$240.00	\$96.00	Professional Fee	Revise Answer and Counterclaims in red-line format; Email same to Attorney Seipel for review
KAS	08/24/2023	4.60	\$340.00	\$1,564.00	Professional Fee	Case analysis; confer with Attorney Skinner regarding case; send emails to UK family law lawyers for conferral; exchange emails with client; consult with Jersey criminal law lawyer
WAG	08/28/2023	1.00	\$240.00	\$240.00	Professional Fee	Begin preparing exhibits to Answer; Revise, scan, and email Answer and Counterclaims to client for review; Email from client
KAS	08/28/2023	0.30	\$340.00	\$102.00	Professional Fee	Finalize Answer
WAG	08/29/2023	0.20	\$240.00	\$48.00	Professional Fee	Download and save Proof of Service filed by opposing counsel; Email to Attorney Seipel re: same
WAG	08/29/2023	1.40	\$240.00	\$336.00	Professional Fee	Review and redact exhibits (246 pages); Finalize, scan, and e-file Answer and Affirmative Defenses; Email Same to opposing counsel; Email same to client
KAS	08/29/2023	0.50	\$340.00	\$170.00	Professional Fee	Exchange emails with client regarding Answer; confer with Attorney Skinner regarding case timeline/scheduling
KDS	08/30/2023	0.30	\$410.00	\$123.00	Professional Fee	Confer with Attorney Seipel regarding case strategy and setting case management hearing
KAS	08/30/2023	0.30	\$340.00	\$102.00	Professional Fee	Leave voicemail for and exchange emails with opposing counsel regarding scheduling
KAS	09/01/2023	0.40	\$340.00	\$136.00	Professional Fee	Exchange emails with opposing counsel regarding conferral on Rule 16 checklist
KAS	09/05/2023	0.40	\$340.00	\$136.00	Professional Fee	Call with opposing counsel regarding Rule 16 checklist
KDS	09/05/2023	0.40	\$410.00	\$164.00	Professional Fee	Review checklist and request for expedited trial
WAG	09/05/2023	0.70	\$240.00	\$168.00	Professional Fee	Revise, finalize, and prepare Rule 16 Checklist as exhibit to Brief; Revise, finalize, scan, and e-file Respondent's Brief in Support of Request for Expedited Trial Date; Email same to opposing counsel; Email re: same to client; Email Rule 16 Checklist to court in Word format
KAS	09/05/2023	3.50	\$340.00	\$1,190.00	Professional Fee	Confer with Attorney Skinner regarding case; draft Rule 16 checklist and supporting brief; analyze case and moving for sanctions
KDS	09/06/2023	0.20	\$410.00	\$82.00	Professional Fee	Confer with Attorney Seipel regarding case strategy and timing of possible motion for sanctions
KAS	09/06/2023	1.50	\$340.00	\$510.00	Professional Fee	Exchange emails with court regarding scheduling Rule 16 conference; confer with Attorney Skinner regarding case; exchange emails with client regarding retaining Jersey criminal law lawyer as expert; exchange emails with Paul Nicholls and Merle Weiner
KAS	09/07/2023	0.20	\$340.00	\$68.00	Professional Fee	Exchange emails with court regarding status conference
KAS	09/08/2023	2.00	\$340.00	\$680.00	Professional Fee	Exchange emails with opposing counsel regarding status conference; exchange emails with client regarding the same; confer with Attorney Skinner regarding case; exchange emails with attorney David Steenson regarding next steps





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**SPIRIT BRIDGER, USDC Case 3:23-cv-00850-IM**

Prof	Date	Units	Price	Amount	Component	Narrative
KAS	09/11/2023	1.60	\$340.00	\$544.00	Professional Fee	Email expert attorney Merle Weiner regarding consult; email David Steenson regarding meeting; confer with Attorney Skinner regarding case; continue case analysis and legal research
KAS	09/12/2023	1.00	\$340.00	\$340.00	Professional Fee	Meet with attorney David Steenson
KDS	09/13/2023	0.30	\$410.00	\$123.00	Professional Fee	Confer with Attorney Seipel regarding next steps in case and timing of deadlines
WAG	09/13/2023	0.50	\$240.00	\$120.00	Professional Fee	Confer with Attorney Seipel re: hearing; Download, save, and email order after hearing to client; Calendar all deadlines, pre-trial hearing, and Trial dates
KAS	09/13/2023	2.30	\$340.00	\$782.00	Professional Fee	Attend status conference; exchange emails with Dr. Poppleton; continue case analysis
WAG	09/14/2023	0.20	\$240.00	\$48.00	Professional Fee	Create Zoom invite and email same to potential trial expert
WAG	09/14/2023	0.40	\$240.00	\$96.00	Professional Fee	Email to/from court re: requested copies of exhibits to Answer; Print hard copies and begin creating notebook of same for delivery to Judge
KAS	09/14/2023	0.40	\$340.00	\$136.00	Professional Fee	Confer with Paralegal Goodyear and Attorney Skinner regarding delivery of exhibits; exchange emails with Dr. Poppleton
WAG	09/15/2023	0.50	\$240.00	\$120.00	Professional Fee	Prepare index and finish creating notebook of exhibits to Answer and Affirmative Defenses for delivery to judge; Print expert article for Attorney Seipel for review
KAS	09/15/2023	4.40	\$340.00	\$1,496.00	Professional Fee	Review Hague treatise; prepare for and meet with Merle Weiner; continue case analysis; exchange emails with client regarding the same
KDS	09/18/2023	1.40	\$410.00	\$574.00	Professional Fee	Travel to/from courthouse; deliver hard copy of Answer and exhibits to judge's clerk per court's request
KAS	09/18/2023	1.00	\$340.00	\$340.00	Professional Fee	Call with Dr. Poppleton
KAS	09/19/2023	0.60	\$340.00	\$204.00	Professional Fee	Exchange emails with opposing counsel regarding delivery of exhibits; confer with Paralegal Goodyear regarding the same
KDS	09/20/2023	0.40	\$410.00	\$164.00	Professional Fee	Confer with Attorney Seipel regarding requirement forthcoming deadlines and various witness statement requirements; discuss expert witnesses
LWD	09/20/2023	0.20	\$140.00	\$28.00	Professional Fee	Create and send link for zoom meeting to UK expert and Attorney Seipel
KAS	09/20/2023	4.50	\$340.00	\$1,530.00	Professional Fee	Work to obtain immigration attorney consult; confer with Attorney Skinner regarding presentation of exhibits to opposing counsel; draft and send email to opposing counsel regarding the same; confer with Attorney Skinner regarding expert witnesses; consult with Attorney Marandas; work on analysis of custodial rights; confer with Attorney Steenson regarding next steps
KDS	09/21/2023	0.80	\$410.00	\$328.00	Professional Fee	Analyze immigration issue, review lay witness statement draft, confer with Attorney Seipel regarding trial preparation
WAG	09/21/2023	0.80	\$240.00	\$192.00	Professional Fee	Confer with Attorney Seipel re: upcoming deadlines and disclosures; Draft Expert Witness Disclosure; Forward to Attorney Seipel for review



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## SPIRIT BRIDGER, USDC Case 3:23-cv-00850-IM

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KAS	09/21/2023	5.30	\$340.00	\$1,802.00	Professional Fee	Consult with Scottish immigration attorney; meet with client via zoom regarding case updates; exchange emails with Attorney McWilliams and client regarding client's visa status; confer with Attorney Skinner regarding the same; exchange emails with client regarding witnesses and contact information; draft witness list; confer with Attorney Skinner regarding witnesses; voicemail from opposing counsel regarding motions in limine; send email to opposing counsel regarding the same; receive and review terms and conditions from Attorney Steenson
WAG	09/22/2023	1.00	\$240.00	\$240.00	Professional Fee	Confer with Attorney Seipel re: exhibits; Draft Exhibit List; Forward same to Attorney Seipel for review
WAG	09/22/2023	3.00	\$240.00	\$720.00	Professional Fee	Review, compile, index, redact, and bookmark exhibits in preparation for service on opposing counsel; Finalize, scan, and email Exhibit List, Expert Disclosures, and Lay Witness List to opposing counsel with exhibits; Email re: same to client
WAG	09/22/2023	0.20	\$0.00	\$0.00	Professional Fee	Finalize, scan, and email signed engagement letter to David Steenson's office; Confer with accounting manager re: wiring funds for retainer (no charge)
KDS	09/22/2023	0.40	\$410.00	\$164.00	Professional Fee	Review and revise lay and expert witness list and statements
KAS	09/22/2023	5.10	\$340.00	\$1,734.00	Professional Fee	Voicemail from opposing counsel regarding DHR learning summary; call from opposing counsel regarding settlement; exchange emails with client regarding the same; send email to Attorney Steenson requesting CV; revise and finalize lay witness statement; revise and finalize expert witness statement; revise and finalize exhibit list
KDS	09/25/2023	0.30	\$410.00	\$123.00	Professional Fee	Review and revise communication to opposing counsel; confer with Attorney Seipel regarding case strategy
WAG	09/25/2023	0.40	\$240.00	\$96.00	Professional Fee	Email from/to expert witness re: signed engagement agreement; Create paperwork for and arrange for transfer of expert retainer via international wire
KAS	09/25/2023	3.70	\$340.00	\$1,258.00	Professional Fee	Confer with client regarding opposing party's witnesses; draft and send email to opposing counsel regarding improper disclosures and motion in limine; receive and review opposing party's witness statement; forward the same to client and Dr. Poppleton; confer with client regarding the same; confer with Legal Assistant Dudley regarding witness interviews; work on trial memo
KAS	09/26/2023	0.30	\$340.00	\$102.00	Professional Fee	Send email to opposing counsel regarding voicemails regarding motion in limine
WAG	09/27/2023	0.10	\$240.00	\$24.00	Professional Fee	Email to US consulate in Scotland re: dates closed during Covid pandemic
KAS	09/27/2023	0.80	\$340.00	\$272.00	Professional Fee	Receive and review email from opposing counsel purporting to be witness statements/disclosures
MGV	09/28/2023	1.10	\$125.00	\$137.50	Professional Fee	Assemble notebooks of exhibits for use in trial.
WAG	09/28/2023	0.30	\$240.00	\$72.00	Professional Fee	Email to expert witness requesting copy of CV for use as exhibit; Email to/from court re: instructions for delivery of hard-copy of exhibits to court staff
WAG	09/28/2023	0.30	\$0.00	\$0.00	Professional Fee	Instructions to and confer with Legal Assistant Via re: creation of exhibit notebooks (no charge)





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WAG	09/28/2023	3.00	\$240.00	\$720.00	Professional Fee	Review email from opposing counsel; Download and save exhibits received from opposing counsel; Draft cover pleading to accompany Respondent's Exhibit for e-filing; Draft Joint Exhibit List; Draft Joint Witness and Summary of Witness Statements; Forward pleadings to Attorney Seipel for review
KAS	09/28/2023	6.60	\$340.00	\$2,244.00	Professional Fee	Confer with Paralegal Goodyear regarding consulate closure dates; receive and review exhibits from opposing counsel; forward the same to client; work on trial memorandum; confer with Paralegal Goodyear regarding Attorney Steenson's CV
WAG	09/29/2023	0.40	\$240.00	\$96.00	Professional Fee	Calls (x2) from opposing counsel; Confer with Attorney Seipel re: same
JWT	09/29/2023	0.80	\$475.00	\$380.00	Professional Fee	Review, edit and comment on Respondent's Trial Memorandum;
WAG	09/29/2023	3.20	\$240.00	\$768.00	Professional Fee	Receive CV from Expert David Steenson and prepare same as trial exhibit; Finalize cover sheet for Respondent's Trial Exhibits and combine with exhibits; Proofread, revise, and finalize Respondent's Motion in Limine; Proofread, revise, and finalize Respondent's Trial Memorandum; Finalize Joint Witness List and Joint Exhibit List; Scan, e-file, and e-serve all pleadings, including: Respondent's Motion in Limine, Joint Exhibit List, Joint Witness List, Respondent's Trial Exhibits; and Respondent's Trial Memorandum; Email same to opposing Email re: same to client; Print all pleadings and prepare them for delivery with exhibits to the court
KAS	09/29/2023	8.20	\$340.00	\$2,788.00	Professional Fee	Confer with Dr. Poppleton regarding additional documentation received from opposing; conduct research regarding sanctions in Hague cases; draft motion in limine for sanctions; review and revise joint witness list and joint exhibit list; complete trial memorandum; draft short objection to opposing's motion in limine and send to opposing counsel via email; deliver exhibits to the court
WAG	10/02/2023	0.20	\$240.00	\$48.00	Professional Fee	Email from/to client; Confer with Attorney Seipel re: any contact from opposing counsel following judge's order? (none received)
WAG	10/03/2023	0.10	\$240.00	\$24.00	Professional Fee	Download scheduling order from court docket; Email to Attorney Seipel re: same
WAG	10/03/2023	0.20	\$240.00	\$48.00	Professional Fee	Email copies of Petition, Answer, and Trial Exhibits to Expert Witness Steenson
KAS	10/03/2023	1.60	\$340.00	\$544.00	Professional Fee	Send email to Dr. Poppleton regarding conferral and report; confer with Paralegal Goodyear regarding documents to send to Attorney Steenson for review; receive witness contact information from opposing counsel; send email to opposing counsel requesting documents Dr. McGuire relied upon; exchange emails with client regarding updates
KAS	10/04/2023	1.80	\$340.00	\$612.00	Professional Fee	Review case law and send to Legal Assistant Dudley for witness interviews; confer with Dr. Poppleton regarding analysis; confer with client regarding trial preparations; receive and review emails from opposing counsel regarding discovery; analyze motion for summary judgment



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WAG	10/05/2023	0.70	\$240.00	\$168.00	Professional Fee	Prepare exhibits to Supplemental Brief; Proofread, revise, finalize, scan, e-file, and e-serve Supplemental Brief in Support of Respondent's Motion in Limine; Email same to opposing party; Email re: same to client
LWD	10/05/2023	1.00	\$140.00	\$140.00	Professional Fee	Review case law and prepare for witness interview
KAS	10/05/2023	2.50	\$340.00	\$850.00	Professional Fee	Draft supplemental brief in support of motion in limine; confer with Attorney Skinner regarding the same
WAG	10/06/2023	0.40	\$240.00	\$96.00	Professional Fee	Download and save new Scheduling Order from court; Confer with Attorney Seipel re: same
LWD	10/06/2023	3.00	\$140.00	\$420.00	Professional Fee	Make phone calls to witnesses and perform interviews; type up & edit notes on calls and send to team
KAS	10/06/2023	0.70	\$340.00	\$238.00	Professional Fee	Receive email from opposing counsel regarding discovery; receive and review judge's order on motion in limine; forward the same to client; exchange emails with court regarding opposing party's request for telephonic appearance at trial
LWD	10/09/2023	0.20	\$140.00	\$28.00	Professional Fee	Call with Lisa Conway
KAS	10/09/2023	0.40	\$340.00	\$136.00	Professional Fee	Exchange emails with Attorney Steenson regarding trial preparations
WAG	10/10/2023	0.10	\$240.00	\$24.00	Professional Fee	Download and save Petitioner's Trial Memorandum; Email same to client for review
KAS	10/10/2023	0.80	\$340.00	\$272.00	Professional Fee	Email from opposing counsel regarding opposing party's telephonic appearance at trial; receive and review opposing's trial memorandum; send email to Dr. Poppleton regarding conferral for trial prep
WAG	10/11/2023	0.10	\$240.00	\$24.00	Professional Fee	Download, save, and email to client most recent court order
WAG	10/12/2023	0.80	\$240.00	\$192.00	Professional Fee	Compile exhibits to Second Supplemental Brief and send to Attorney Seipel for review; Proofread, revise, finalize, scan, e-file, and e-serve Second Supplemental Brief in Support of Respondent's Motion in Limine; Email same to opposing counsel; Email re: same to client; Copy and prepare same for delivery to judge in hard-copy;
WAG	10/12/2023	0.20	\$240.00	\$48.00	Professional Fee	Email from court; Email to/from client re: hearing
SJH	10/12/2023	0.50	\$280.00	\$140.00	Professional Fee	Deliver documents to federal courthouse.
LWD	10/12/2023	1.50	\$140.00	\$210.00	Professional Fee	Call with and email to Rayya Ghul; call with Nikki Sirstadt; call with Morgan Sanborn re: getting in touch with her husband; call to Andrea Knight; revise/edit witness call notes, and send updated copy of notes to team
KAS	10/12/2023	3.20	\$340.00	\$1,088.00	Professional Fee	Confer with Paralegal Goodyear regarding documents to produce to Dr. Poppleton; draft second supplemental brief in support of motion in limine; receive and review order from court regarding opposing's ex parte submissions; receive and review additional discovery from opposing; receive correspondence from court regarding tomorrow's pretrial conference
MGV	10/13/2023	1.20	\$125.00	\$150.00	Professional Fee	Assemble notebooks of exhibits for the use of the client and the witness box in trial.



BUCKLEY LAW P.C.

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5300 Meadows Road, Suite 200  
Lake Oswego, OR 97035

## SPIRIT BRIDGER, USDC Case 3:23-cv-00850-IM

Prof	Date	Units	Price	Amount	Component	Narrative
WAG	10/13/2023	2.00	\$240.00	\$480.00	Professional Fee	Trial prep (continued): Create notebook for Petitioner's possible trial exhibits; Compile, print, and index relevant pleadings for pre-trial conference; Create notebook of same; Draft exhibit list for use at trial; Confer with Attorney Seipel re: needs for pre-trial conference and result of same
KAS	10/13/2023	3.90	\$340.00	\$1,326.00	Professional Fee	Prepare for pretrial conference; Travel to/from federal courthouse and attend pretrial conference
KAS	10/14/2023	10.70	\$340.00	\$3,638.00	Professional Fee	Trial preparation, including preparing trial notes and witness questions
KAS	10/15/2023	9.30	\$340.00	\$3,162.00	Professional Fee	Trial preparation including continuing to draft witness questions and reviewing exhibits, motions, and court documents
WAG	10/16/2023	2.00	\$240.00	\$480.00	Professional Fee	Proofread, finalize, scan, and e-file Notice of Intent to Seek Fees; Email same to opposing counsel; Download, save, and print additional filings by opposing counsel; Print additional emails with attachments, case law, and various documents for use in court; Create notebook for case law for judge
WAG	10/16/2023	1.00	\$240.00	\$240.00	Professional Fee	Travel to/from Federal Courthouse to deliver additional notebooks to Attorney Seipel
WAG	10/16/2023	0.10	\$240.00	\$24.00	Professional Fee	Email to/from witness re: testifying remotely
MKJ	10/16/2023	0.50	\$130.00	\$65.00	Professional Fee	Deliver binders to Attorney Seipel at court
KAS	10/16/2023	9.80	\$340.00	\$3,332.00	Professional Fee	Review materials in preparation for trial; travel to/from courthouse and attend trial
WAG	10/17/2023	1.00	\$240.00	\$240.00	Professional Fee	Draft Supplemental Exhibit List and cover sheet to Supplemental Exhibit; Redact and prepare Exhibit 131 in preparation for submission to court; Email all to Attorney Seipel for review
WAG	10/17/2023	0.50	\$240.00	\$120.00	Professional Fee	Email expert witness re: court information for remote testimony; Call to local witnesses re: confirming availability and information for appearance at trial on 10/18/2023; Email re: same to Attorney Seipel
WAG	10/17/2023	0.40	\$0.00	\$0.00	Professional Fee	Email to/from expert witness' office; Obtain approval for and coordinate payment of invoice for same (no charge)
KAS	10/17/2023	12.10	\$340.00	\$4,114.00	Professional Fee	Continue with trial preparations; travel to/from courthouse and attend trial
WAG	10/18/2023	0.40	\$240.00	\$96.00	Professional Fee	Finalize, scan, e-file, and e-serve Respondent's Supplemental Exhibit List and Respondent's Supplemental Exhibit; Email re: same to opposing counsel; Print copies for delivery to court; Email to witness re: access to courthouse
WAG	10/18/2023	0.70	\$240.00	\$168.00	Professional Fee	Travel to/from federal courthouse to deliver additional documents to Attorney Seipel
KAS	10/18/2023	12.00	\$340.00	\$4,080.00	Professional Fee	Prepare for final day of trial; travel to/from courthouse and attend trial
WAG	10/19/2023	0.90	\$240.00	\$216.00	Professional Fee	Proofread, revise, finalize, redact, scan, e-file, and e-serve Respondent's Closing Argument; Email same to client; Print copy for Attorney Seipel for delivery to Judge Immergut
WAG	10/19/2023	0.50	\$0.00	\$0.00	Professional Fee	Confer with Attorney Seipel re: results of day 3 of trial; Discuss next steps for written closing arguments (no charge)

EXHIBIT 1

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BUCKLEY LAW P.C.

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**SPIRIT BRIDGER, USDC Case 3:23-cv-00850-IM**

Prof	Date	Units	Price	Amount	Component	Narrative
KAS	10/19/2023	5.60	\$340.00	\$1,904.00	Professional Fee	Write closing argument and send to Paralegal Goodyear to proofread and submit to court
WAG	10/24/2023	0.20	\$240.00	\$48.00	Professional Fee	Download and save Judge's Opinion and Judgment; Calendar deadline for opposing's appeal of ruling
WAG	10/24/2023	0.60	\$240.00	\$144.00	Professional Fee	Read, review, and confer with team re: court ruling (no charge)
WAG	10/25/2023	0.50	\$240.00	\$120.00	Professional Fee	Email expert witness copy of ruling by Judge Immergut; Download and save news article; Email same to Attorney Seipel; Email client re: news article (no charge)
TOTAL		219.40		\$68,926.50		

**FEES**

Initials	Hours	Rate	Total
JWT	0.8	475.00	\$380.00
KDS	12.4	410.00	\$5,084.00
KAS	159.8	340.00	\$54,332.00
KAS	0.2	0.00	\$0.00
SJH	0.5	280.00	\$140.00
WAG	2.3	0.00	\$0.00
WAG	32.2	240.00	\$7,728.00
LWD	1.9	0.00	\$0.00
LWD	6.5	140.00	\$910.00
MKJ	0.5	130.00	\$65.00
MGV	2.3	125.00	\$287.50
219.4			\$68,926.50

**COSTS**

Date	Description	Total
8/10/2023	Expert Witness Retainer: Poppleton	\$3,750.00
9/5/2023	Research Costs	\$683.91
9/19/2023	Expert Witness Fee: Weimer	\$400.00
9/21/2023	Mileage Reimbursement	\$12.31
9/25/2023	Expert Fee: Steenson	\$5,195.15
10/18/2023	Expert Witness Fee: Poppleton	\$7,968.75
10/18/2023	Mileage/Parking Reimbursement	14.76
10/20/2023	Mileage/Parking Reimbursement	12.76
10/20/2023	Mileage/Parking Reimbursement	86.83
10/24/2023	Mileage/Parking Reimbursement	12.71
10/24/2023	Mileage/Parking Reimbursement	12.71
TOTAL		\$18,149.89